



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 27 1987

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Special Review Action Code 870-Maneb Data Screen for
Sweet Corn - MRID No. 401335-01 [RCB No. 2138]

FROM: Martin F. Kovacs Jr., Ph.D., Chemist
Tolerance Petition Section II
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

Martin F. Kovacs Jr.

THRU: Charles L. Trichilo, Ph.D., Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769C)

NO

TO: Joan Warshawsky
Special Review Branch
Registration Division (TS-769C)

and

Henry Jacoby
Science Integration Staff
Hazard Evaluation Division (TS-769C)

RD has asked RCB to perform the following: "Please screen to determine compliance with DCI and whether this crop can be returned to label per OPP agreement with Task Force".

RCB has screened the maneb and ethylene thiourea (ETU) residue data contained in the subject study, however, RCB cannot make a determination as for returning sweet corn to the maneb label since to RCB's knowledge this crop has not been removed from the maneb label.

Sweet Corn (MRID No. 401335-01)

Included in this submission are:

1. Resubmitted residue data for maneb on corn ears (husks removed), corn forage and new residue data for ETU on corn ears (husks removed) and corn forage from a Florida field trial, MTF No. 85-21, dated February 2, 1987.
2. Resubmitted residue data for maneb on corn ears (husks removed) and corn forage. Reanalyzed and new residue data for ETU on corn ears (husks removed) from a New York field trial, MTF No. 85-22, dated February 2, 1987.

3. Resubmitted and additional residue data for maneb on corn ears (husks removed) and resubmitted residue data for maneb on corn forage. Resubmitted maneb and new ETU residue data on sweet corn cannery waste from a Wisconsin field trial, MTF No. 85-23 dated February 2, 1987.

Comments

None of the resubmitted or additional residue data for maneb and reanalyzed or new residue data for ETU were supported by frozen storage stability data although the extended storage intervals for ETU samples could range from 9 to 16 months for corn ears and up to 11 1/2 months for corn forage and cannery waste. In addition, maneb corn forage samples were held in a ground and frozen condition for up to 4 days before analysis.

Conclusions

1. The currently resubmitted or additional residue data for maneb and reanalyzed or new residue data for ETU on sweet corn are deficient because none of the residue data were supported by frozen storage stability data although residue samples could have been held in frozen storage for approximately 9 to 16 months prior to analysis. In addition, the maneb residue samples were stored in a ground frozen condition for up to 4 days prior to analysis which may have accelerated the decomposition of maneb residues. Therefore, RCB concludes that the submitted residue data are not even adequate for a dietary exposure assessment and thus do not pass the screen. These studies must be repeated to comply with the NRDC reassessment and DCI requirements.
2. Although we have identified only the obvious deficiencies in this screen, additional data deficiencies for the currently submitted residue study may be noted upon completion of a full RCB review.

cc: W. Boodee, E. Zager, Reviewer-M. Kovacs, A Barton, SF., RF.,
Ellenberger-SRB/RD, PMSD/ISB
RDI:J. Onley:4/20/87:R.D Schmitt:4/20/87
TS-769C:M. Kovacs:mt:CM#2:Rm.810:557-7324:4/24/87